

TO: Environment Ministers of the EU Member States
CC: Executive Vice-President for the Clean, Just and Competitive Transition, Commissioner for Environment, Water Resilience and the Chair of the European Parliament Environment Committee



Re: Input to the Council conclusions on A European Water Resilience Strategy

Brussels, 28 July 2025

Dear Environment Minister,

On behalf of the Living Rivers Europe Coalition, I am writing to share our views on the draft Council conclusions on the European Water Resilience Strategy, discussed on 17 July at the meeting of the Council's Working Party on Environment, and foreseen for adoption by Environment Ministers in October. In order to respond to the growing urgency of water scarcity, floods, pollution, and ecosystem degradation across the continent, we believe it is important to prioritise the preservation or restoration of the natural water cycle, and access to clean drinking water for people.

We urge you to ensure that the Council conclusions:

- endorse the objectives of the EU Water Resilience Strategy;
- reaffirm Member States' commitment to the preservation of natural freshwater ecosystems and to limiting pollution;
- stress the need for the mainstreaming of water resilience across sectors, mobilising adequate financial resources, and accelerating the implementation of existing legislation.

Mismanagement of water and accelerating climate change are making Europeans increasingly vulnerable to water pollution, water scarcity, and floodings. Poor water governance costs Europe annual losses of €9 billion from floods and droughts alone.¹ It is therefore essential that the Council conclusions endorse the objectives of the European Water Resilience Strategy, in particular the objective of restoring and protecting the water cycle as the basis for sustainable water supply.

In addition, appropriate governance tools are needed to ensure meaningful implementation of the Strategy and systemic change. New EU or national policy initiatives or land-use decisions that exacerbate water stress, increase vulnerability to funding, or increase exposure to pollution, need to be avoided. The Council conclusions should therefore highlight the need to secure all initiatives under the European Green Deal which contribute to delivering genuine water resilience. They should also request the European Commission and Member States to integrate water resilience systematically across sectorial policies and funding programmes, including within the EU and its Member States' objectives related to, among others, agriculture, energy production, digital economy, transport, and competitiveness.

The success of the Water Resilience Strategy relies on the implementation of existing water and nature legislation. The Water Framework Directive (WFD) includes instruments such as pollution standards, abstraction permits, ecological flow standards, cost recovery and basin-scale restoration, which are key to the achievement of the Water Resilience Strategy's objectives. The Council conclusions should therefore reaffirm Member States' commitment to implement the current programmes of measures under the WFD, and to use the upcoming Structural Dialogues on WFD implementation with the European Commission to address the current implementation gaps before 2027, including through systematic monitoring, better control and phased reductions in water abstractions.²

¹ European Commission (2023). Accompanying the Report from the Commission to the European Parliament and the Council – 8th Environment Action Programme Monitoring Report: Working Document. https://climate.ec.europa.eu/system/files/2023-12/SWD_2023_932_1_EN.pdf

² All abstractions should be monitored, and water abstraction permits should be compulsory for all water abstractions and regularly updated based on climate scenarios.

Resilience cannot be built on depleted and over-extracted rivers and aquifers. While we urge you to support the establishment of a European methodology for implementing and mainstreaming the “water efficiency first” principle in European and national legislation, the Council conclusions should also require that the water efficiency target is complemented by a water abstraction target, and that the methodology to be developed by the European Commission guarantees that higher water use efficiency also leads to lower freshwater consumption overall.

A credible water resilience strategy must also prioritise pollution prevention at the source and enforce strong accountability for polluters. The Council conclusions should also reaffirm their commitment to the implementation of the Polluter Pays Principle, including the full application of the Extended Producer Responsibility as required under the Urban Wastewater Treatment Directive.

Nature-based solutions are the backbone of water resilience. In order to preserve water resources, minimise water losses and limit energy use, measures that naturally retain water in the landscape, such as the restoration of active floodplains and wetlands, should be prioritised over technological solutions to water stress such as water storage in man-made reservoirs, or desalination. Member States should reaffirm their commitment to fully implement the Nature Restoration Regulation and to include water and climate resilience in the design and implementation of Nature Restoration Plans.

At present, the Strategy lacks dedicated funding, in particular to support the uptake of nature-based solutions for water resilience. In this respect, Council conclusions should call for earmarked funds for water resilience in the next Multi-annual Financial Framework (MFF) for 2028-2034, with clear and science-based performance indicators. A significant share of the financial support to cross-border projects in the next MFF should be allocated to the Green and Blue Corridor initiative, and to the Sponge Facility, both proposed by the European Water Resilience Strategy. Furthermore, Member States should ensure that well-resourced, earmarked funding for the objectives of the LIFE programme, a key funding instrument for water resilience projects, remains in the next EU budget. Member States should also call for mandatory conditionality on waterways and groundwater protection and wetland protection for all farms under the next Common Agricultural Policy; reject the proposed changes of the CAP simplification, notably relating to GAEC2; and stress the need for real incentive measures for peatland protection and water retention going beyond the legal requirements. Finally, Council conclusions should call on the European Investment Bank to earmark most of the investments planned under the new Sustainable Water Advisory Facility to nature-based solutions improving water retention in the landscape or ecological flows, as those projects are the most in need of technical assistance.

We remain available for any follow-up discussion.

Yours sincerely,



Faustine Bas-Defossez
Director for Nature, Health and Environment of the European Environmental Bureau

On behalf of *Living Rivers Europe* ³



³ **Living Rivers Europe** is a coalition of six environmental and angling organisations: [WWF's European network](#), the [European Anglers Alliance](#), [European Environmental Bureau](#), [European Rivers Network](#), [Wetlands International Europe](#) and [The Nature Conservancy](#).